

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

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|---------------------------------|---|--------------------------|
| GREGORY THOMAS BERRY, et al., |) | |
| |) | |
| Plaintiffs, |) | |
| |) | Case No. 3:11-cv-754-JRS |
| |) | |
| v. |) | |
| |) | |
| LEXISNEXIS RISK & INFORMATION |) | |
| ANALYTICS GROUP, INC., et. al., |) | |
| |) | |
| Defendants. |) | |

MOTION FOR RECONSIDERATION AND EXPEDITED BRIEFING AND HEARING

Watts Guerra LLP respectfully files this Motion for Reconsideration and Expedited Briefing and Hearing in response to the Parties’ Joint Motion to Correct so-called “misrepresentations” made by attorney Ryan Thompson and his firm, Watts Guerra LLP (together, “Watts Guerra”) (Docs. 82 and 83) and the Court’s subsequent Order regarding the same (the “Take-Down Order”) (Doc. 84).

The accompanying Memorandum in Support sets for the reasons supporting this Motion.

WHEREFORE, Watts Guerra, LLP, by counsel, respectfully requests that the Court: (1) set an expedited briefing and hearing schedule on this issue, as set forth in the accompanying Memorandum and Proposed Order; and (2) reconsider and vacate the Take-Down Order.

Dated: October 24, 2013

Respectfully Submitted,

/s/
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CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of October, 2013, I caused the foregoing document to be electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to CM/ECF participants, and that I caused the foregoing document to be sent by first class mail to the following non-CM/ECF participants:

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